

**Hearing Date: November 16, 2022**  
**Opposition Date: August 22, 2022**  
**Reply Date: September 21, 2022**

Pamela A. Miller  
Amber Covucci  
O'MELVENY & MYERS LLP  
Seven Times Square  
New York, New York 10036  
Telephone: (212) 326-2000  
E-mail: pmiller@omm.com  
*Attorneys for Merrill Lynch International*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,  Plaintiff-Applicant,  v.  BERNARD L. MADOFF INVESTMENT SECURITIES LLC,  Defendant.	Adv. Pro. No. 08-01789 (CGM)  SIPA Liquidation  (Substantively Consolidated)
In re:  BERNARD L. MADOFF,  Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff,  Plaintiff,  v.  MERRILL LYNCH INTERNATIONAL,  Defendant.	Adv. Pro. No. 10-05346 (CGM)

**NOTICE OF MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that Defendant Merrill Lynch International, by and through its undersigned counsel, submits its memorandum of law and accompanying declarations and exhibits in support of its motion to dismiss the complaint of Plaintiff Irving H. Picard, trustee for the liquidation of Bernard L. Madoff Investment Securities LLC and the substantially consolidated estate of Bernard L. Madoff under the Federal Rules of Civil Procedure.

Dated: June 23, 2022

New York, New York

Respectfully submitted,

O'MELVENY & MYERS LLP

By: /s/ Pamela A. Miller

Pamela A. Miller

Amber Covucci

O'MELVENY & MYERS LLP

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New York, New York 10036

Telephone: (212) 326-2000

E-mail: pmiller@omm.com

*Attorneys for Merrill Lynch International*